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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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In the Matter of

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JUL 31 2000

Amendment of Section 73.622(b)

Table of Allotments

Digital Television Broadcast Stations
(Killeen, Texas)

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MM Docket No. 00-103
RM-9878
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

**COMMENTS OF WHITE KNIGHT BROADCASTING
OF KILLEEN LICENSE CORPORATION**

White Knight Broadcasting of Killeen License Corporation ("White Knight"), licensee of Station KAKW(TV), NTSC Channel 62, Killeen, Texas, by its attorneys, hereby submits these comments in support of the Notice of Proposed Rulemaking ("NPRM") issued by the Commission in the above-captioned proceeding in connection with the Petition for Rulemaking ("Petition") filed by White Knight on February 2, 2000.¹ The NPRM proposes to amend Section 73.622(b) of the Commission's Rules, the DTV Table of Allotments, by substituting Channel 13 at coordinates 30° 43' 33" N-Lat and 97° 59' 24" W-Lon, with a power level of 39.4 kW and a height above average terrain ("HAAT") of 553 meters, as the DTV allocation for KAKW-DT in lieu of Channel 23 at coordinates 31° 18' 52" N-Lat and 97° 19' 37" W-Lon, as originally allotted.

¹ White Knight's Petition for Rulemaking, which provides the public interest benefits and engineering analysis for the proposed amendment to the DTV Table of Allotments, is incorporated herein by reference.

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As set forth in the Engineering Statement submitted with the Petition and as found by the Commission in its NPRM, Channel 13 may be allotted and assigned for DTV operations by Station KAKW at this new transmitter site with an ERP of 39.4 kW, with a non-directional antenna, and a HAAT of 553 meters. As the Engineering Statement demonstrates, this channel substitution complies with the requirements of Section 73.623(c) of the Rules. Specifically, as required by Section 73.623(c), the substitution of DTV Channel 13 at Killeen, Texas will comply with the principal community coverage requirements of Section 73.625(a) and is acceptable under the 2%/10% *de minimis* interference criteria.

In addition, the proposed amendment to the DTV Table will serve the public interest by facilitating the deployment of DTV in Texas. Amending the DTV Table by substituting DTV Channel 13 for Station KAKW's allotted DTV Channel 23 will enable White Knight to operate its DTV and NTSC stations from the same transmitter site. In addition, the proposed amendment will permit Station KAKW to provide over 100 percent replication of its NTSC CP service area during the DTV transition period.

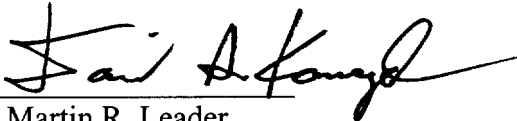
White Knight hereby reconfirms its desire and intent to construct and operate Station KAKW-DT on Channel 13, as proposed. If the DTV Table is amended as proposed in the NPRM, White Knight will promptly submit an application for a construction permit for its DTV station on the newly allotted channel. Upon grant of the construction permit, White Knight will construct and begin operations of its new digital facility in accordance with the Commission's Rules.

Conclusion

For the foregoing reasons, White Knight respectfully requests that the Commission promptly adopt the changes to the DTV Table proposed in the NPRM and amend Section 73.622(b) of the Rules to substitute DTV Channel 13 for DTV Channel 23 at Killeen, Texas, at reference coordinates 30° 43' 33" N-Lat and 97° 59' 24" W-Lon, with an ERP of up to 39.4 kW and an HAAT of 553 meters.

Respectfully submitted,

**White Knight Broadcasting of Killeen
License Corporation**

By: 

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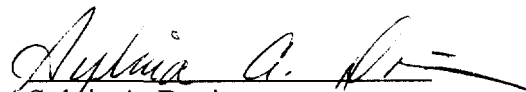
Its Attorneys

Dated: July 31, 2000

CERTIFICATE OF SERVICE

I, Sylvia A. Davis, a secretary in the law firm of Shaw Pittman, hereby certify that on this 31st day of July 2000, I caused to be served by hand delivery a copy of the foregoing "COMMENTS OF WHITE KNIGHT BROADCASTING OF KILLEEN LICENSE CORPORATION" on the following:

John A. Karousos, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
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Sylvia A. Davis